

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
In Re:)	
)	
EDGARD VASQUES DEMIRANDA NETO,)	Case No. 16-10026-MSH
)	Chapter 7
Debtor)	
_____)	
)	
SHAMROCK FINANCE, LLC,)	
)	
Plaintiff)	
)	Adversary Proceeding
Vs.)	No. 01077
)	
EDGARD VASQUES DEMIRANDA NETO,)	
)	
Defendants)	
_____)	

ANSWER

Edgard Vasques deMiranda Neto, the herein Chapter 7 debtor and the defendant in the adversary proceeding ("Defendant"), hereby answers the First Amended Complaint (the "Complaint") filed in the adversary proceeding by the Shamrock, Finance, LLC (the "Plaintiff"), as follows:

PARTIES

1. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 1 of the Complaint.
2. Admitted.

FACTS COMMON TO ALL COUNTS

3. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 3 of the Complaint.

4. Admitted.

5. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 5 of the Complaint.

6. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 6 of the Complaint.

7. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 7 of the Complaint.

8. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 8 of the Complaint.

9. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 9 of the Complaint.

10. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 10 of the Complaint.

11. Denied.

12. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 12 of the Complaint.

13. Admitted.

14. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 14 of the Complaint.

15. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 15 of the Complaint.

16. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 16 of the Complaint.

17. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 17 of the Complaint.

18. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 18 of the Complaint.

19. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 19 of the Complaint.

20. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 20 of the Complaint.

21. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 21 of the Complaint.

22. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 22 of the Complaint.

23. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 23 of the Complaint.

24. Admitted.

COUNT I
Exception to Discharge
11 U.S.C. §523(a)(2)

25. Defendant incorporates and re-alleges his answers to the allegations contained in paragraphs 1 through 24 above as if fully set forth herein.

26. Admitted.

27. Denied.

28. Denied.

29. Denied.

30. Denied.

31. Denied.

32. Denied.

COUNT II
Exception to Discharge
11 U.S.C. §523(a)(4)

33. Defendant incorporates and re-alleges his answers to the allegations contained in paragraphs 1 through 32 above as if fully set forth herein.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

COUNT III
Exception to Discharge
11 U.S.C. §523(a)(6)

38. Defendant incorporates and re-alleges his answers to the allegations contained in paragraphs 1 through 37 above as if fully set forth herein.

39. Paragraph 39 of the Complaint sets forth conclusions of law to which no response is required.

40. Paragraph 40 of the Complaint sets forth conclusions of law to which no response is required.

41. Denied.

42. Denied.

COUNT IV
Exception to Discharge
11 U.S.C. §523(a)(19)(B)(i)

43. Defendant incorporates and re-alleges his answers to the allegations contained in paragraphs 1 through 42 above as if fully set forth herein.

44. Denied. Further answering, the claim of Plaintiff does not arise from the purchase or sale of a security and therefore Section 523(a)(19) is not applicable here.

45. Paragraph 45 of the Complaint sets forth conclusions of law to which no response is required.

46. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 46 of the Complaint.

47. Defendant is without sufficient facts to either admit or deny the allegations contained in paragraph 47 of the Complaint.

48. Admitted.

49. Denied.

WHEREFORE, Defendant prays that the Court enter judgment in her favor on all counts contained in the Complaint.

EDGARD VASQUES DEMIRANDA NETO

By her attorney,

/s/ George J. Nader

George J. Nader
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Dated: June 13, 2016

CERTIFICATE OF SERVICE

I, George J. Nader, do hereby certify that I have this day served a copy of the **ANSWER**, by first class mail, postage prepaid to individuals on the attached Service List and/or by electronic mail on all ECF registered users.

EDGAR VASQUEZ DEMIRANDA NETO
By his attorney,

/s/ George J. Nader

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Dated: June 13, 2016

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